

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

BODUM USA, INC. and PI-DESIGN AG,

Plaintiffs,

v.

STARBUCKS CORPORATION,

Defendant.

DECLARATION OF HOWARD  
SCHULTZ IN SUPPORT OF  
DEFENDANT STARBUCKS  
CORPORATION'S MOTION FOR  
PROTECTIVE ORDER

Case No. 1:23-cv-02946

Hon. Andrea R. Wood

I, Howard Schultz, declare as follows:

1. I am the former chief executive officer ("ceo") of Starbucks Corporation ("Starbucks"). I have personal knowledge of the facts stated herein and, if called as a witness, would testify competently thereto.

2. In 1982, I moved to Seattle to join Starbucks as the director of operations and marketing. At the time, Starbucks had only 4 stores. Over the past four decades, Starbucks grew to more than 39,000 stores worldwide.

3. During my career at Starbucks, I served as the ceo during two separate periods. I served as ceo from August 1987 to 2000. In 2000, I stepped down from the ceo role to focus on international expansion as global chief strategist and chairman. In January 2008, I returned to the ceo role until my retirement in 2018. I also served as interim ceo from April 4, 2022, until I retired again in March 2023.

4. I began my second term as ceo of Starbucks in January 2008. At that time, I was made aware of a lawsuit filed by Bodum against Starbucks during the fall of 2007. The Bodum

Group's CEO Joergen Bodum has been a dear friend of mine for nearly forty years.

5. When I began my second term as ceo of Starbucks in January 2008, I asked Harry Roberts to join the company as senior vice president and chief creative officer. At that time, I tasked Mr. Roberts with resolving the pending litigation with Bodum. Beyond simply telling Mr. Roberts to work with Mr. Bodum and Starbucks legal department to resolve the litigation, I do not remember providing Mr. Roberts any direction on how the dispute should be resolved.

6. I understand that Starbucks settled the litigation with Bodum in mid-January 2008, just two weeks into my second term as ceo. I was not a participant in settlement negotiations or strategy, nor execution of the 2008 settlement agreement. To the best of my knowledge, I have never read the 2008 settlement agreement.

7. As the ceo of Starbucks, I was not involved in the day-to-day decisions regarding merchandise development, commercialization, sourcing, or sales. Instead, during my tenures as ceo, hundreds of Starbucks partners managed the development, commercialization, sourcing, and sales of thousands of different products sold in Starbucks stores. Starbucks sourcing and merchandise development partners have been organized into different Starbucks departments over the years and managed by senior vice presidents and vice presidents with varying titles and assignments.

8. Because decisions regarding merchandise development, commercialization, sourcing, and sales were delegated to hundreds of Starbucks partners outside my executive leadership team during my tenures as ceo, I had only a very high-level knowledge of the merchandise sold in Starbucks stores, often informed by my frequent visits to Starbucks stores around the world.

9. I have no knowledge of the sourcing or sales of the Espro Press that is the subject

of this litigation. I was not involved in the decision to source the Espro Press, nor do I know who was involved in this decision.

10. In June 2022, and again in August 2022, while serving as interim ceo for Starbucks, I participated in meetings with Mr. Bodum and his son, Peter Bodum, with several Starbucks merchandise sourcing vice presidents and partners. Kelly Bengston, then senior vice president, chief procurement officer, for Starbucks, attended these meetings. The goal of these meetings was to restart Starbucks relationship with Bodum, which had been terminated in 2020 before I returned as Starbucks interim ceo.

11. During the June and August 2022 meetings with Mr. Bodum and Peter Bodum, I do not recall discussing the 2008 settlement agreement, nor the Espro Press.

12. During my time as interim ceo from April of 2022 to March of 2023, I urged Mr. Bodum and Starbucks sourcing vice presidents and partners to restart the partnership between Bodum and Starbucks. While I was informed by Mr. Bodum and Kelly Bengston that an obstacle to a partnership between the parties was a dispute over the 2008 settlement agreement, I did not investigate the nature of that dispute nor direct how that dispute should be resolved. Instead, as was my practice as ceo, I deputized my executive and senior leadership teams to work with Mr. Bodum to determine whether a solution could be achieved.

13. In March 2023, I stepped down from my role as interim ceo. Six months later, in September 2023, I stepped down from my position on Starbucks Board of Directors. I now serve in the honorary role of Chairman Emeritus at Starbucks.

14. I co-founded the Schultz Family Foundation and the emes project LLC, and have an active role at both organizations. The Foundation focuses on helping young people successfully navigate the transition to adulthood, creating greater opportunity accessible to all. I am intimately

involved in the continued development of the American Opportunity Index, a Foundation-sponsored initiative, assessing how well America's largest companies are working to maximize their internal talent, as well as identifying and working with organizations that serve our youth in Washington State and nationally. Through the Index project, I am working to bring an entrepreneurial lens to public-private partnerships, strategic advocacy, policy challenges, and political reform with the goal of enabling everyone to access the full promise of America. In addition, I am making investments in the entrepreneurial companies of tomorrow, offering mentoring and guidance through the perspective of my experience building Starbucks. I routinely meet with, advise, and counsel senior executives leading these companies and often travel to speak at company meetings and leadership conferences to share my personal wisdom and experience with employees. Since leaving Starbucks in March of 2023, I conduct a variation of these activities on a daily basis. Due to my current duties, sitting for a deposition in this matter would impose a significant burden on me.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

EXECUTED this 23rd day of August 2024:

By:

  
Howard Schultz